as in the principal case, the legislature creates an office and provides that its incumbent shall exercise powers some of which are of local and some of state-wide concern, there is authority for adjudging the whole act invalid. *City of Evansville* v. *State ex rel.*, 118 Ind. 426, 4 L. R. A. 93.

NEGLIGENCE—PARENT'S NEGLIGENCE NOT IMPUTED TO CHILD.—The plaintiff, a three-year-old infant, was maimed by the dangerous alluring machinery of the defendant company, around which she was accustomed to play. Her father was manager of the defendant company, resided with her upon the premises and knew of her habit of playing near the uncovered machinery. *Held*, that the parent's negligence could not be imputed to the child, since the child is not responsible for the negligence of its parents. *Clover Creamery Co.* v. *Diehl* (Ala. 1913) 63 So. 196.

The decision in the principal case represents the trend of modern decisions and the weight of authority. *Neff* v. *City of Cameron*, 213 Mo. 350, 18 L. R. A. N. S. 320; *Union Pac. Ry. Co.* v. *Young*, 57 Kan. 168, 45 Pac. 580; *City of Murphyboro* v. *Woolsey*, 47 Ill. App. 447. In the extensive note in 18 L. R. A. N. S. 320 the annotator declares that since 1892 the decisions in nearly all the states except New York (which continues to follow *Hatfield* v. *Roper*, 21 Wend. 615, 34 Am. Dec. 273) have been in favor of the doctrine of the principal case. Cases appearing to announce a contrary rule are *Holly* v. *Boston Gas Light Co.*, 74 Mass. 123, 69 Am. Dec. 233, and *Leslie* v. *City of Lewiston*, 62 Me. 468. See 4 MICH. L. REV. 79, 167; 9 ID. 165.

RAILROADS—INJURIES TO TRESPASSERS—CARE AFTER INJURY.—Decedent, while riding on one of defendant's freight trains, was thrown off and received serious injury. While utterly helpless and bleeding profusely, he was placed by defendant's agents and servants, over his protest, in an unheated box car, where he was allowed to remain without medical attention or other care for about four hours, and in consequence of such exposure and negligence he bled to death before reaching a hospital to which he was subsequently taken. *Held*, that, though defendant was not liable for the original injury, its servants having assumed control over decedent over his protest and with knowledge of his imminent peril, their conduct amounted to wanton negligence in decedent's treatment, for which defendant was liable. *Slater* v. *Illinois Cent. R. Co.* (C. C. Tenn. 1913) 209 Fed. 480.

The authorities generally agree that a railroad company, free from negligence in injuring a trespasser, cannot be made liable on the ground that its servants were negligent in caring for him after the accident. The railroad company is under no legal obligation—however strong the moral obligation—to take charge of the wounded man. If the law were otherwise "no humane or gratuitous act could be done without subjecting the doer of it to an action on the ground that the defendant ought to have acted more quickly or with more judgment." *Union Pac. R. Co.* v. *Capper*, 66 Kans. 649; *Griswold* v. *Boston etc. R. R. Co.*, 183 Mass. 434; *Kendall* v. *Louisville & N. R. Co.*, 25 Ky. Law Rep. 793; Contra; *Northern C. R. Co.* v. *State*, 29 Md. 420; *Baltimore & O. R. R. Co.* v. *State*, 41 Md. 268; *Whitesides* v. *Southern R. Co.*,